

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA)	CRIMINAL NO. 2:10-cr-0004
)	
v.)	Lancaster, C.J.
)	
JOSEPH PAPP)	

DEFENDANT’S MOTION FOR TRAVEL

AND NOW comes the Defendant, Joseph Papp (“Papp”), by his attorneys, William F. Ward, Esquire, and the firm of Ward McGough, LLC, and respectfully moves this Honorable Court for an Order permitting Papp to travel to Denver, CO, in September 2010.

In support of this motion, Papp respectfully avers as follows:

1. On February 17, 2010, Papp waived indictment and entered his plea of guilty to a two-count Information. Papp was released on a \$25,000 unsecured bond that limits his travel outside of the Western District of Pennsylvania to the Northern District of Ohio.
2. Papp’s sentencing hearing is currently scheduled for September 24, 2010. (However, by separate motion, Papp will file his Motion to Continue Sentencing from September 2010 until December 2010. The government consents to the continuance of Papp’s sentencing hearing.)
3. Papp and his undersigned counsel have previously advised the Court that additional time was needed to develop and present evidence that would be of value to Papp at the time of his sentencing hearing, particularly with reference to Paragraph B.4 of the document that has been filed under seal with the Court [Doc. #8]. In that regard, the General Counsel of the United States Anti-Doping Agency (“USADA”) of Colorado Springs, Colorado, recently

requested that Papp travel to Denver, Colorado, to attend an expedited AAA arbitration hearing scheduled for Tuesday, September 14, 2010.

4. In view of the foregoing, Papp respectfully requests leave of Court to travel from the Western District of Pennsylvania to the District of Colorado. It is requested that Papp travel from Pittsburgh, Pennsylvania, to Denver, Colorado, on Monday, September 13, 2010. It is anticipated that Papp will return to the Western District of Pennsylvania on Wednesday, September 15, 2010.

5. On September 7, 2010, Assistant United States Mary McKeen Houghton advised that she has no objection to the relief requested in this Motion.

6. On September 9, 2010, United States Probation Office Michael Howard advised that he consents to the relief requested in this Motion.

WHEREFORE, based upon the foregoing, the Defendant respectfully requests that his Motion be granted and that he be authorized to travel from the Western District of Pennsylvania to the District of Colorado on September 13, 2010, and to return on September 15, 2010.

Respectfully submitted,

WARD McGOUGH, LLC

/s/ William F. Ward

William F. Ward, Esquire

PA I.D. No. 25266

2312 Koppers Building

436 Seventh Avenue

Pittsburgh, PA 15219

(412) 395-1245

Counsel for Defendant,
Joseph Papp